

HOUSING IMPACT STATEMENT

Brant Street & Ghent Avenue

City of Burlington

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Prepared for:
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EXECUTIVE SUMMARY

This Housing Impact Statement (the "Statement") has been prepared in support of a proposed Official Plan and Zoning By-law Amendment to facilitate the redevelopment of the thirteen properties located at the intersection of Brant Street and Ghent Avenue, in the City of Burlington (the "Subject Lands"). MHBC Planning was retained by The Molinaro Group (the "Owner") to prepare a Housing Impact Statement for the Subject Lands.

The Subject Lands are currently occupied by existing surface parking, single-family dwellings, a 2-storey medical building, and a 2-storey rental apartment.

The proposed development will provide for total of 847 residential units, built over three parcels or phases, with a mix of one-bedroom, two-bedroom, and three-bedroom apartment units. There are 14 existing rental units on site. In order to retain the existing rental housing, per the policies of the Region of Halton Official Plan and the City of Burlington's in-force and new Official Plans, the Region can purchase 14 units in Parcel A or Parcel B at a reduced rate so that the Region can then facilitate their rental to the existing tenants at their same rents. In this manner, no residents will be displaced during the construction of the proposed development.

In addition, if the Region would like to pursue further units in the proposed development for the provision of affordable housing, an additional 14 units can be purchased at a discounted rate. This option has some precedence in the area, including the Paradigm development on Fairview Street. Exact details on the purchase structure and facilitation of these units as affordable would be determined in later stages of the approval process.

As per the policies of the Halton Region Official Plan as amended by ROPA 48, the Subject Lands are designated Urban Area and are further designated a Strategic Growth Area as part of an Major Transit Station Area ("MTSA") on a Priority Transit Corridor as identified on Map 1h: Regional Urban Structure. Specifically, the Subject Lands are within the delineated boundary of the Downtown Burlington Urban Growth Centre ("UGC") and the Burlington GO MTSA as identified on Map 6b: Downtown Burlington UGC/Burlington GO MTSA.

In the City of Burlington's in-force Official Plan (1997) the Subject Lands are designated "Mixed Use Activity Area" per Schedule A: Settlement Pattern of the City's in-force Official Plan. The Subject Lands are further designated "Mixed Use Corridor – General" per Schedule B: Urban System of the City's in-force Official Plan.

In the City's New Official Plan (2020), which is currently under appeal, the Subject Lands are designated 'Urban Centre' on Schedule B: Urban System. Schedule B-1: Growth Framework designates the Subject Lands as within a 'Primary Growth Area'. Schedule D: Downtown Urban Centre designates the Subject Lands as within the Upper Brant Precinct of the Downtown Urban Centre.

All of the current and evolving applicable land use policies support the intensification of the Subject Lands. The proposed residential units will contribute towards meeting the City and Region's intensification targets and will supply housing for the City of Burlington in conformance with the housing intensification policies of the Regional Official Plan and the City of Burlington New Official Plan. A full assessment of the proposed development against the Regional and City housing objectives and policies that must be addressed is included under Section 7.0.

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1.0 Introduction

MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") has been retained by The Molinaro Group (the "Owner") to prepare a Housing Impact Statement for the proposed redevelopment of the properties located at the intersection of Brant Street and Ghent Avenue in the City of Burlington (the "Subject Lands"). For the purposes of this development application, the thirteen (13) properties that make up the Subject Lands have been described as parcels. Each parcel and their municipal addresses are shown in the table below:

Table 1 – Property Description	
Property	Address
Parcel A	0, 774, 778, 780, 782 Brant Street
Parcel B	769, 779, 783 Brant Street, 2023, 2027, 2031-2033 Ghent Avenue
Parcel C	747, 761 Brant Street
TOTAL	13 Properties

This Housing Impact Statement has been prepared in support of proposed amendments to the in-force City of Burlington Official Plan ("In-force OP") and Zoning By-law (the "Applications") to facilitate the redevelopment of the Subject Lands with a total of 847 residential units, 1038 vehicular parking spaces, and 2,834m^2 of indoor and outdoor amenity space.

1.1 Purpose and Approach

The City of Burlington's New Official Plan (2020 – Under Appeal) requires that a Housing Impact Statement (the "Statement") be prepared when more than 100 units are included in a development proposal. This Statement conforms to the Terms of Reference ("TOR") provided by the City of Burlington to guide its preparation. The TOR for this Statement requires the following to be addressed:

- Demonstration of how the proposed conversion of existing rental units complies with Policy in Part III, Section 2.3.2 f) of the City Official Plan (1997, as amended);
- Demonstration of how the proposed conversion of existing rental units complies with Section 3.1.2 (Housing Tenure) of the City's New Official Plan (2020);
- Demonstration of how the development addresses Section 3.1.1(2) h) and other applicable policies of the City's New Official Plan (2020);
- Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count;
- Identification and discussion of the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report; and,
- Identification and discussion of other relevant and current housing information available.

Section 3.1.1(2) h) of the City of Burlington's New Official Plan (2020) provides additional clarification on the components that must be addressed as part of a Housing Impact Statement. This includes the following relevant policies:

(i) *how the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units;*
(ii) *how the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;*
(iii) *where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable; and*
(iv) *the proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.*

Note that this Statement has been prepared in the context of the City's New Official Plan (2020) ("New OP") as per the TOR noted above. The New OP is currently under appeal and thus not in-force.

2.0 Existing Site & Planning Context

2.1 Site Description

The Subject Lands consist of thirteen (13) properties on the northwest, northeast, and southeast corners of the Brant Street and Ghent Avenue intersection in the City of Burlington. For the purposes of the proposed development and applications, the properties have been assembled into three parcels which will then be developed over three phases. The three parcels have a total site area of 1.71 ha consisting of various frontages along Brant Street and Ghent Avenue.

As of the date of this Statement, the parcel at the northwest corner ("Parcel A") is current vacant. This site represents an assembly of 5 properties, as shown in Table 1 above, 4 of which contained single-family dwellings, all of which have since been demolished. The property at the northeast corner ("Parcel B") includes an existing 90 space parking lot at 769 Brant Street which accommodates the medical office building at the southeast corner. This parcel also includes three single family dwellings on the north side of Ghent Avenue east of the parking lot. As noted in the Planning Justification Report in support of the applications, the property at 783 Brant Street was not part of the initial Formal Consultation submission and has since been assembled and added to the application.

The third parcel ("Parcel C") includes the assembly of two properties, one of which contains a 2 storey medical building. The property at 747 Brant Street, which is also part of Parcel C, contains a 2-storey rental apartment building comprised of 14 two-bedroom units which range in size from 757 sq.ft to 920 sq.ft with monthly rent rates ranging from $771.00 to $991.00. The existing tenants are provided parking at a rate of 1 space per unit. As described in further detail below, this building will be demolished to accommodate the proposed development and the existing rental units will be replaced with new units in buildings in one of the first two phases.

Pedestrian access is provided from both Brant Street and Ghent Avenue. Vehicular access and parking for Parcel B and Parcel C is provided from Ghent Avenue. Vehicular access for Parcel A is currently provided from Brant Street. There is a signalized intersection at Brant Street and Ghent Avenue.

2.2 **Surrounding Land Uses & Neighbourhood Context**

The surrounding uses are described as follows:

NORTH: Immediately north of the Subject Lands are a number of low-rise commercial and mixed-use buildings along Brant Street. Further northeast are commercial uses including a Walmart, the Burlington GO Station and the Paradigm Condominium Development.

EAST: Immediately east of the Subject Lands along Ghent Avenue are low-rise residential uses in the form of single-detached and semi-detached residential dwellings. Further to the east, is Optimist Park and Tom Thomson Public School.

SOUTH: Immediately south of the Subject Lands are a number of low-rise commercial, retail, and residential uses with mid-rise and high-rise residential uses located closer to Lakeshore Road.

WEST: Immediately west of the Subject Lands is Burlington Square Plaza, which has a 2-storey commercial and office podium with a residential apartment above and stepped back from the street. Further to the west is Michael Manor on Hager Avenue, as well as a number of low-rise residential uses.

The surrounding context of the area includes both the concentration of a range of uses along the Brant Street corridor as well as within the surrounding community. The area is served by retail and service commercial uses, as well as community, recreational and institutional uses. The surrounding area is also a part of the Burlington GO MTSA on a Priority Transit Corridor and the Burlington UGC. As part of the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor, this area is expected to be a major focus for growth, intensification and redevelopment over the long-term.

Since the proposed development is located within the Burlington GO MTSA on a Priority Transit Corridor, this site can take advantage of the opportunities afforded by the proximity of a major transit facility. This site is also located on a north-south local transit route (Brant Street) – Line Number 2, which connects the downtown area with the GO station. There is an existing transit stop in front of the site for the northbound route on Brant Street at Ghent Avenue as well as a transit stop on the southbound route at Brant Street and Ghent Avenue. The property also has access to the east-west routes on Fairview Street which allow for connections easterly to the Appleby Go Station and westerly to Mapleview Mall and beyond.

Based on the above physical context and surrounding neighbourhood, the Subject Lands are in a location that is in close proximity to future residents' daily needs, including commercial, employment and community uses as well as existing and planned transit services. As part of the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor, the site is an optimal location for intensification and the provision of additional residential units to support the growth of this area as a complete urban community.

2.3 **Planning Context**

The Subject Lands are designated as 'Urban Areas' and within the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor in the current Regional Official Plan ("ROP"), as amended by ROPA 48, on Map 1h: Regional Urban Structure. Within the Regional Urban Structure, this is the highest priority on the hierarchy of Strategic Growth Areas. The Subject Lands are located within the built boundary of the Region. Map 3: Functional Plan of Major Transportation Facilities in the Regional Official Plan indicates that Brant Street south of Plains Road West is a Minor Arterial Road. Map 6b: Downtown Burlington UGC/Burlington GO MTSA shows the delineated boundary of the Downtown Burlington UGC/Burlington GO MTSA.

Schedule A: Settlement Pattern of the City of Burlington in-force OP shows that the Subject Lands are designated 'Mixed Use Activity Area' within the urban boundary. Therefore, units on the site will contribute towards meeting the City's and Region's intensification targets, as discussed further in this Statement. Schedule B: Land Use Plan (Urban Planning Area) of the in-force OP shows that the Subject Lands are designated 'Mixed use Corridor – General' and within the Downtown Urban Growth Centre Boundary.

The City of Burlington's in-force OP has not been updated to reflect the latest Provincial and Regional growth management objectives, including ROPA 48. Therefore, many of the applicable development policies and standards in the in-force OP do not reflect the current language and designations that are applicable to the Subject Lands at a provincial and regional level. This includes boundary delineation and density targets for the Burlington GO MTSA and the identification of Strategic Growth Areas in the Regional Official Plan.

Schedule B: Urban Structure of the City of Burlington's New OP, shows that the Subject Lands are designated 'Urban Centres' and within the Urban Growth Centre Boundary. The site is located within the delineated built boundary of the City of Burlington. Therefore, as stated above, units on the site will contribute to the City's and Region's intensification targets. In addition, the proposed development has been designed to be compact, pedestrian-friendly and well-connected to public transportation, as the Subject Lands are within the Burlington GO MTSA.

Schedule B-1: Growth Framework of the City of Burlington New OP shows that the Subject Lands are located in a Primary Growth Area. Schedule C: Land Use – Urban Area designates the Subject Lands as Urban Centre. Under this designation, Policy 8.1.1 states that the design and development of Urban Centres will "provide opportunities to create and/or maintain a special community identity and a primary focal point for a wide variety of employment, residential, shopping, leisure and educational opportunities". The proposed development will provide transit-supportive residential density on an underutilized site with existing municipal servicing capacity. This development will reduce land consumption and servicing costs, provide amenities, and contribute to a compact built form within the Downtown Burlington UGC/Burlington GO MTSA.

Schedule D: Land Use – Downtown Urban Centre of the City of Burlington New OP shows that the Subject Lands are located within the Upper Brant Precinct of the Downtown Urban Centre. Under this designation, Policy 8.1.1(3.8) states the tallest developments in this precinct will be located along and north of Ghent Avenue, where the Subject Lands are located. In addition, residential uses, with the exception of single detached dwellings, semi-detached dwellings and other forms of stand-alone ground-oriented dwellings are permitted.

The proposed development conforms to the land use planning policy context for the Subject Lands. The Subject Lands are in a prime location for intensification and growth from a Provincial and

Regional policy perspective, being a Strategic Growth Area, a MTSA on a Priority Transit Corridor, and located within the Downtown Burlington UGC. The focus for development in these areas is to accommodate intensification and higher-density mixed uses that are transit-supportive in a compact built form. In the in-force City of Burlington Official Plan, the Subject Lands are designated 'Mixed Use Activity Areas' and 'Mixed Use Corridor – General' within the Downtown UGC. The new City of Burlington Official Plan designates the Subject Lands as 'Urban Centres' as part of a Primary Growth Area. Urban Centres will be a focal point for a wide variety of uses and densities. The new City of Burlington Official Plan further designates the Subject Lands as part of the Upper Brant Precinct within the Downtown Burlington Urban Centre. Although both the in-force and new City of Burlington Official Plan have not been updated to reflect the latest Provincial and Regional policies, the City of Burlington also recognizes these sites as an area for intensification and growth.

2.4 **Proposed Development**

The proposal provides for a mixed-use development consisting of three residential buildings to be built over three phases with ground floor retail located on Parcel A and Parcel B, indoor and outdoor amenity space, and below-grade parking spaces.

As mentioned above, the proposed development will be built over three phases or parcels (Parcel A, Parcel B, and Parcel C). The proposed development on Parcel A will consist of the properties at the northwest corner of the Brant Street and Ghent Avenue intersection. Upon full build-out, Parcel A is proposed to contain two high-rise residential towers connected by a 5-storey podium with ground floor retail and amenity space. The residential tower on the west side of Brant Street is proposed to be built to a maximum height of 25 storeys. The residential tower just north of Ghent Avenue are to be built to a maximum height of 18 storeys. The proposed development will provide significant stepping down in the form of a 3-storey base around the east, south, and western edges of the building. Both towers have floor plate areas of 750m^2 and are spaced 32.5m apart. Privately-owned publicly accessible spaces ("POPs") will be provided along the north side of Ghent Avenue towards the Brant Street and Ghent Avenue intersection. The total residential gross floor area ("GFA") for Parcel A is 35,401m^2. Parcel A will provide a total of 444 residential units in studio, 1, and 2 bedroom unit types. In addition, 15% of each unit type will be built as barrier-free. The proposed floor space index ("FSI") for Parcel A is 5.4.

Vehicular access to Parcel A is provided from the west side of Ghent Avenue through an internal drive-aisle providing access to the underground parking, the at-grade loading areas, and the at-grade retail/visitor parking spaces. Parcel A proposes 3 levels of underground parking, for a total of 471 residential parking spaces and 67 retail/visitor spaces provided below-grade. Parking will be provided at a rate of 1.15 spaces per unit. Parcel A will provide a total of 1407m^2 of amenity space, split over indoor amenity, outdoor amenity, and terraces/balconies. Amenity space will be provided on the ground floor, the 4th floor, and the 6th floor.

The proposed development on Parcel B will consist of the properties at the northeast corner of the Brant Street and Ghent Avenue intersection. Upon full build-out, Parcel B will contain a 25-storey residential building, with significant stepping down towards the Brant Street edge and westwards along Ghent Avenue. The single 25-storey tower has a floorplate area of 750m^2. The ground floor will also contain retail and amenity space. The total residential GFA for Parcel B is 24,501m^2. Parcel B will provide a total of 283 residential units in 1, 2, and 3-bedroom unit types. Just like Parcel A, 15% of each unit type will be built as barrier-free. The proposed FSI for Parcel B is 4.6.

Vehicle access to Parcel B is provided from the east side of Ghent Avenue through an internal drive-aisle providing access to the underground parking and the at-grade retail/visitor parking spaces. Parcel B proposes 2 levels of underground parking, for a total of 299 residential parking spaces and 43 retail/visitor parking spaces provided below-grade. Parking will be provided at a rate of 1.15 spaces per unit. Parcel B will provide a total of 738m^2 of amenity space, split over indoor amenity, outdoor amenity, and terraces/balconies. Indoor amenity space will be provided on the ground floor and the 8th floor. Outdoor amenity spaces are provided above the podium step backs, as well as at the ground level on the east end of the site in the form of a private outdoor park space.

Finally, the proposed development on Parcel C will consist of the properties at the southeast corner of the Brant Street and Ghent Avenue intersection. Upon full build-out, Parcel C will contain a maximum 8-storey residential building with ground floor amenity space provided along Brant Street. The building will be setback from Brant Street with a 3-storey building base. In addition, the proposed building has been designed to offer gradation of built form between the Brant Street frontage and the residential uses to the east. Parcel C will provide for a total of 120 residential units in 1, 2, and 3-bedroom unit types. 15% of each unit type in Parcel C will be built as barrier-free. The proposed FSI for Parcel C is 3.3.

Vehicle access to Parcel C will be provided from the east side of Ghent Avenue through an internal drive-aisle providing access to the underground parking. Parcel C proposed 2 levels of underground parking, for a total of 137 residential parking spaces and 19 visitor/retail parking spaces. Parking will be provided at a rate of 1.15 spaces per unit. Parcel C will provide a total of 689m^2 of amenity space, split over indoor amenity, outdoor amenity, and terraces/balconies. Indoor amenity will be provided on the ground floor and the 9th floor.

As mentioned above, Parcel C contains a 2-storey rental apartment building comprised of 14 two-bedroom units which range in size from 757 sq.ft to 920 sq.ft with monthly rent rates ranging from $771.00 to $991.00. Each unit is provided with 1 parking space. In order to ensure that existing rental housing is not lost, the Owner has presented a preferred option to Halton Region for the Region to purchase 14 of the condominium units from Parcel A or Parcel B at a discounted rate and then offer the units for rent. The Region can then maintain the current rents of the units which will be stipulated through a lease agreement. Parking can be excluded from the purchase as it will make each of the units more affordable.

In addition, if the Region would like to pursue further units in the proposed development for the provision of affordable housing, an additional 14 units can be purchased at a discounted rate and offered for rent. This option has some precedence in the area, including the Paradigm Condominium development on Fairview Street. Exact details on the purchase structure and facilitation of these units as affordable will be determined in later stages of the approval process.

The table below provides a detailed breakdown of the proposed development site statistics:

Table 1: Summary of Proposed Redevelopment Statistics

Characteristic	Description		
	PARCEL A	**PARCEL B**	**PARCEL C**
Total Site Area	6,704 m^2	5,333 m^2	3,910 m^2
Proposed Total Gross Floor Area	36,195 m^2	24,501 m^2	12,835 m^2
Proposed Residential Units	444	283	120

Characteristic	Description		
	PARCEL A	PARCEL B	PARCEL C
Proposed Residential Units to Replace Existing Rental Units	14 units		N/A
Proposed 1-Bedroom Residential Units	261	164	50
Proposed 2-Bedroom Residential Units	181	117	67
Proposed 3-Bedroom Residential Units	0	2	3
Proposed Studio Residential Units	2	0	0
Range of Unit Sizes	525 sq.ft – 1400 sq.ft	500 sq.ft – 1280 sq.ft	530 sq.ft – 2479 sq.ft
Proposed Density	5.4 FSI	4.6 FSI	3.3 FSI
Total Parking Spaces	538 Spaces	342 Spaces	156 Spaces
Residential Parking	471	299	137
Visitor/Retail Parking	67	43	19
Total Amenity Space	1407 m^2	738 m^2	689 m^2

3.0 Provincial Housing Context

The following is a review of the provincial land use policies applicable to the proposal, and a summary of how the proposal meets these policies. The policies identified below are focused on housing, as per the City of Burlington's TOR.

3.1 Provincial Policy Statement (2020)

The Provincial Policy Statement (2020) (the "PPS") was issued under Section 3 of the Planning Act and came into effect on February 28, 2020. The PPS establishes the policy foundation for regulating the development and use of land in Ontario and provides policy direction on matters of provincial interest related to land use planning and development. It provides a vision for land use planning in Ontario that encourages an efficient use of land, resources and public investment in infrastructure.

The PPS strongly encourages development that will provide long term prosperity, environmental health and social well-being. These directives depend on the efficient use of land and development patterns that support strong, livable and healthy communities that protect the environment and public health and facilitate economic growth.

Section 1.0 – Building Strong and Healthy Communities describes how healthy, liveable and safe communities are sustained:

"1.1.1 Healthy, liveable and safe communities are sustained by:

b) *accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*

The proposed redevelopment consists of a mix of unit sizes in order to improve the range of residential housing types and sizes available within the City of Burlington. The proposed development will intensify a currently underutilized site within the existing built-up area, and provide for 847 new residential units with a mix of 1, 2, and 3 bedroom units. The location of the proposed redevelopment within the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor will also support continued economic investment by providing additional population density supportive of public transit. The proposed development will also provide for commercial/retail uses that will continue to serve the area. In addition, 14 existing rental units on site will be replaced on site as Halton Region can purchase 14 units of a similar type and size at a discounted rate. . These 14 units can be maintained and rented by the Region at a similar current rental rate. Halton Region can also purchase additional units at a discounted rate for the further provision of affordable housing.

Section 1.4, Housing, provides policies to support housing options across the province as follows:

"1.4.3 Planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:

b) permitting and facilitating:

i. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and

ii. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;

c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;

d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;

e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and,

f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety."

The proposed development represents a form of residential intensification in an area where appropriate levels of infrastructure and public services exist. It will efficiently utilize land and infrastructure by providing 847 residential units in a compact urban built form on a site which currently consists of surface parking, a 2-storey residential apartment, and single-detached dwellings. The proposed development provides a mix of unit types (1, 2, and 3 bedrooms), in order

to ensure housing needs are met for a wide variety of occupants including larger households. The 14 existing two-bedroom rental units on site will be replaced on site with units of a similar size and similar rental structure through the provision of units that can be purchased and maintained by Halton Region. 15% of all units in all three parcels will be developed as barrier-free units. Additional units can also be purchased by Halton Region and offered at an affordable level. The proposed development will assist with achieving a transit-supportive density within the area and support the use of active transportation due to the proximity to trails, parks, walking paths, and continent access to local and regional public transit. The development has been designed to integrate with the surrounding community and will contribute to a mix of housing types to meet current and future needs of residents and achieve a complete community.

3.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020)

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan") was prepared and approved under the *Places to Grow Act, 2005* and updated on August 28, 2020. The Growth Plan establishes a long-term framework for growth and development in the Greater Golden Horseshoe ("GGH"). The Growth Plan encourages the efficient use of land through the development of complete communities that are compact, transit supportive, and provide a range of housing and employment opportunities. The Growth Plan sets out the population and employment forecasts for a land use planning to 2051. The *Planning Act* also requires that decisions affecting a planning matter conform to the Growth Plan.

Section 1.2.1 sets out a vision for the development of the Greater Golden Horseshoe. That vision is grounded in several principles that provide the basis for guiding decisions on how land is developed, resources are managed, and public dollars invested, including:

- Support the achievement of complete communities;
- Prioritize intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability;
- Support a range and mix of housing options, including second units and affordable housing, to serve all sizes, incomes, and ages of households.

The proposal satisfies this vision for growth in the Greater Golden Horseshoe by contributing to a compact, vibrant and complete community in the Downtown Burlington UGC/Burlington GO MTSA. In addition, the proposal optimizes the use of existing water, wastewater and stormwater infrastructure to support growth in a compact and efficient form. The proposal will also provide for a mix of housing options in the Downtown Burlington UGC/Burlington GO MTSA, which is a designated Strategic Growth Area, including the potential provision of affordable housing that is maintained by Halton Region.

Policy 2.2.1.2 states that the vast majority of the forecasted growth to the horizon of the Growth Plan will be directed to Settlement Areas that have a delineated built boundary, have existing or planned municipal water and wastewater systems, and can support the achievement of complete communities. Within Settlement Areas, growth will be focused in delineated built-up areas, Strategic Growth Areas, locations with existing or planned transit, and areas with existing or planned public service facilities.

The proposed development constitutes an intensification project and focuses new growth to the existing Built-Up Area, within the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor. The Subject Lands are identified as being within a Strategic Growth Area as defined by the Growth Plan. The proposed development will add to the range of housing choices available in the City of Burlington, including potential affordable units, and will contribute to a mixed use environment and the achievement of a complete community.

Policy 2.2.1.4 of the Growth Plan states that applying the policies of this Plan will support the achievement of complete communities that:

a) *feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;*
b) *improve social equity and overall quality of life, including human health, for people of all ages, abilities, and incomes;*
c) *provide a diverse range and mix of housing options, including second units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;*
d) *expand convenient access to:*
    i. *a range of transportation options, including options for the safe, comfortable and convenient use of active transportation;*
    ii. *public service facilities, co-located and integrated in community hubs;*
    iii. *an appropriate supply of safe, publicly-accessible open spaces, parks, trails, and other recreational facilities;*
e) *ensure the development of high quality compact built form, an attractive and vibrant public realm, including public open spaces, through site design and urban design standards;"*

The Subject Lands are located in an area identified for intensification by the Province, Region of Halton and City of Burlington, with the expressed purpose of being an area for the greatest allocations of growth. As the Downtown Burlington UGC/Burlington GO MTSA continues to redevelop, the Subject Lands will be in close proximity to a range of land uses, services and public service facilities including stores, community centres, and recreational amenities. The proximity to transit provides convenient access to a range of transportation choices with a focus on higher order transit. A mix of 1-bedroom, 2-bedroom, and 3-bedroom units are proposed. In addition, 15% of all proposed units in all three phased will be developed as barrier-free units. The added density is intended to contribute to transit ridership and support existing public transit. The proposed development will contribute to the provision of high quality built form located at the gateway to the core of the Downtown Burlington UGC. It will make efficient use of space through the optimization of underutilized parcels of land that will be redeveloped to integrate and be compatible with the existing context in terms of design and scale. The proposed development shall be designed to address climate change impacts.

Section 2.2.6 contains policies related to housing and the achievement of complete communities by considering the range and mix of housing options, the densities of the existing housing stock, and policies to diversify the overall housing stock across the Province.

The proposal conforms to these policies by diversifying the range and mix of housing options in Burlington through intensification that provides a range of unit types and sizes that will contribute to achieving forecasted growth and increasing housing supply and choice. It is intended that the proposed development will have a variety of unit sizes, including 1-bedroom, 2-bedroom, and 3-bedroom units which can accommodate different household sizes, including families. The Owner also supports the provision of affordable housing, by proposing that units be purchased by Halton Region at a discounted rate and then rented at an affordable level. Existing rental units on site will be effectively replaced within the first two phases of the proposed development at a similar rent. The proposal will support the creation of complete communities by providing for an appropriate density and mix of uses on site which are within close proximity to transit networks and active transportation infrastructure. A number of nearby amenities that support daily living including schools, community centres, shops, personal services are within walking distance to the Subject Lands.

4.0 Halton Region Housing Context

This section of the Statement describes the applicable housing policies within the Region of Halton Official Plan and the Halton Region 2021 State of Housing Report, endorsed in July 2022.

4.1 Halton Region Official Plan

The Region of Halton Regional Official Plan (the "ROP") serves as Halton's guiding document for land use planning and is intended to manage growth across the Region's four municipalities and was originally adopted in 1994. Since that time the ROP has undergone numerous amendments.

In 2021, the Region adopted Region Official Plan Amendment No. 48 ("ROPA 48") regarding Urban Structure, as the first phase of the Region's Official Plan Review. ROPA 48 has established Strategic Growth Areas throughout the lower-tier municipalities, which are areas targeted for residential intensification and population growth to 2051.

The Regional Official Plan outlines intensification and density targets in Part II, Table 2 of the Regional Official Plan.

Table 2 Intensification and Density Targets	
Municipality	Minimum Number of New Housing Units to Be Added To the Built-Up Area Between 2015 and 2031
Burlington	8,300
Halton Region	32,200

77. It is the policy of the Region to:

(2.1) Direct, through Table 2 and Table 2a, to the Built-Up Area a minimum of 40 per cent of new residential development occurring annually within Halton in 2015 and every year thereafter.

The Regional Official Plan projects that 8,300 new housing units will be added to the built-up area of Burlington between 2015 and 2031. The proposal supports this projection by providing 847

residential units within an area identified for intensification as part of the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor which is the highest on the Regional hierarchy of Strategic Growth Areas. The development proposal will provide for a range of unit types, including units appropriate for young families, barrier-free units, and the potential provision of affordable units offered by the Region contributing to the growth of the Downtown Burlington UGC/Burlington GO MTSA as a complete community.

Table 2B of the Regional Official Plan sets the Strategic Growth Area Targets for the Strategic Growth Areas in Halton Region:

Table 2B Strategic Growth Area Targets			
Strategic Growth Area	Minimum Density Target (Residents and Jobs Combined Per Hectare)	General Target Proportion of Residents & Jobs	
		Residents	Jobs
Downtown Burlington/Burlington GO	200	~65&	~35%

The proposed development will meet the minimum density target for the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor. Based on Halton Region's Development Charges Background Study released on December 15th, 2021, the Housing Occupancy Rates by Dwelling Type in New Units ("PPU") for Apartments – Less than 2 Bedrooms in the Built Boundary is 1.355 and 1.831 for Apartments – 2 or More Bedrooms in the Built Boundary. Therefore, across the entire site area, the proposed development will contribute approximately 800 residents per hectare, far exceeding the minimum density target.

Housing

Part III – Land Stewardship Policies of the Halton Region Official Plan contains the Housing policy section for Halton Region. The overall goal for housing in Halton Region is to "supply the people of Halton with an adequate mix and variety of housing to satisfy differing physical, social and economic needs." This goal will be accomplished through making more efficient use of underutilized lands to increase the supply of housing. The proposed development is an appropriate location to increase the supply of housing within the Downtown Burlington UGC/Burlington GO MTSA. The proposal will increase the diversity of housing in an area that is well-connected to transit and daily needs. The ROP contains the following objectives and policies with respect to housing:

> *"85. The objectives for housing are:*
>
> *(2) To explore and implement new approaches to reduce residential land and construction costs and to effect an adequate supply of Affordable Housing.*
>
> *(3) To coordinate, improve upon, and expedite the development approval process so as to reduce the overall cost of housing.*
>
> *(4) To make more efficient use of existing developed lands, housing stock and available services to increase the supply of housing while maintaining the physical character of existing neighbourhoods.*

(5) To meet housing needs through the provision of Assisted Housing, Affordable Housing and Special Needs Housing in Halton.

(13) To promote residential intensification through the development or redevelopment of brownfield and greyfield sites."

86(6a) At least 50 per cent of new housing units produced annually in Halton be in the form of townhouses or multi-storey buildings.

86(6b) At least 30 per cent of new housing units produced annually in Halton be Affordable or Assisted Housing.

86(11) Permit intensification of land use for residential purposes such as infill, redevelopment, and conversion of existing structures provided that the physical character of existing neighbourhoods can be maintained.

86(19) Require the Local Municipalities to use a rental housing vacancy rate of 3 per cent as the minimum threshold to permit the conversion of existing rental housing to ownership tenure or other uses or the demolition of such housing.

86(21) Require local Official Plans to provide an appropriate mix of housing by density, type and affordability in each geographic area, consistent with current and project demands reflecting socio-economic and demographic trends."

The proposal is for a three parcel residential development project in the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor in the City of Burlington which is the highest on the hierarchy of the Region's Strategic Growth Areas. The Region has indicated that the Downtown Burlington UGC/Burlington GO MTSA will be the primary area for growth and intensification within the Region where increased unit densities are to occur to accommodate population growth, employment growth, and a mix of housing. The proposed development increases the housing unity density in the Downtown Burlington UGC/Burlington GO MTSA, providing 847 residential units and making the Downtown Burlington UGC/Burlington GO MTSA more affordable for current and future residents by providing a unit mix that will increase the range of housing options in the area. These 847 residential units will contribute to Halton Region's 50 per cent housing form target for multi-storey buildings.

As described in Section 2.4 of this Statement, there are 14 existing rental units on Parcel C which will be demolished due to the redevelopment of the site. Those units will be replaced with new units in buildings in one of the first two phases of the redevelopment that Halton Region can purchase at a discounted rate and offer as rental units. Therefore, the existing rental will be effectively replaced and provided before the development of Parcel C occurs. Halton Region can also ensure that the existing rental rates are maintained in the new units. With respect to the provisions of affordable housing, the Owners have offered to allow the Region to purchase additional units in any phase of the project at a discounted rate. The Region will have control of the units and can set the purchase price/rents at an affordable level. Therefore, new affordable housing could be offered in the proposed development that can assist Halton Region in meeting its 30 per cent affordability target. Exact details on the purchase structure and facilitation of these units as affordable will be determined in later stages of the approval process.

Through Draft Regional Official Plan Amendment 49 ("ROPA 49"), Halton Region will accommodate population and employment growth with Halton's existing Regional Urban Boundary to 2041. In order to accommodate this growth, ROPA 49 proposes to significantly increase the applicable intensification and regional phasing targets for Halton Region. Therefore, it will be increasingly important to accommodate additional units through intensification, including on the Subject Lands.

4.2 Halton Region State of Housing Report (2021)

Policy 86(7) of the Halton Region Official Plan states that the Region will provide a State of Housing Report that contains the following:

(i) an update of the definitions of Assisted Housing and Affordable Housing;
(ii) a review of housing supply, demand and need in Halton during the past year, covering the various housing segments of Assisted Housing, Affordable Housing, Market Housing, Special Needs Housing and housing with universal physical access;
(iii) identification of the gaps between supply and demand of Assisted Housing and Affordable Housing;
(iv) state of homelessness in *Halton; and*
(v) performance of the housing market towards meeting the housing targets under Sections 86(6) and 86(6.1).

Halton Region has prepared the State of Housing Report annually since 2006. The Report provides a review of the Region's housing supply and demand and how the Region is implementing its vision for growth. The latest available report for the Region was completed in 2021 and endorsed by Regional Council in July 2022.

Through their State of Housing Report, Halton Region has a prepared a Housing Model which gathers information including household income, spending, costs, and average rents to generate thresholds based on household income and housing costs. The maximum purchase price generated by the Housing Model represents what a household with that income could afford. In 2021, the maximum affordable purchase price for ownership housing across all households was $480,700 with a maximum monthly ownership cost of $3,030 and an income threshold of $121,400. This threshold is used as the index to measure the Regional Official Plan target that 30 per cent of new housing units produced annually are affordable or assisted.

The 2021 State of Housing Report also includes affordable purchase price for small and large households. For small households, consisting of 1 to 2 persons, the maximum purchase price was $320,600 with a maximum monthly ownership cost of $2,010 and an income threshold of $80,400. For large households, consisting of 3+ persons, the maximum purchase price was $660,200 with a maximum monthly ownership cost of $4,190 and an income threshold of $167,500. While these figures are not the current purchase prices for 1, 2, and/or 3-bedroom units across Halton Region, they are provided for the purpose of acting as a threshold to determine when a proposed unit may be under the affordable threshold. At this time, the State of Housing Report does not include information on affordable purchase prices by specific unit types. However, they can still be utilized as a comparison tool. At this time, it is expected that the units will be offered at market rate.

In terms of the purpose-built rental market, the 2021 State of Housing Report states that in Burlington, the average monthly rent for purpose-built rental apartment units was below the maximum affordable rent threshold of $2,300 per month. Similar to the affordable purchase price for small and large units, the State of Housing Report also includes maximum affordable monthly rents for small and large households. For small households, consisting of 1 to 2 persons, the maximum affordable monthly rent is $1,730.00. For large households, consisting of 3+ persons, the maximum affordable monthly rent is $2,940.00. As discussed

above, while these figures are not the current rents for 1, 2, and/or 3 bedroom units across Halton Region, they are provided for the purpose of acting as a threshold to determine when a proposed unit may be under the affordable threshold. At this time, the State of Housing Report does not include information on affordable rents by specific unit types. Based on the existing rents for the 14 two-bedroom units ($771.00 to $991.00), all 14 units will continue to be offered at a rental rate below the affordable threshold.

Although the proposed development will market as condominium units, rent-related information in the State of Housing Report will be discussed as 14 existing rental units will be replaced with new rental units in one of the first two phases.

The maximum purchase price or monthly rent generated by the Housing Model represents what a household with that income could afford, based on Regional Official definitions on housing costs for assisted and affordable housing. **Affordable housing** is a housing with a market price (for purchase) or rent that is affordable to households of low and moderate income, spending no more than 30 per cent of their gross household income on housing, without government assistance. In 2021, there was an increase in affordable new unit sales. However, despite the increase in new affordable units, resale home prices outpaced household income and the overall shortfall of affordable units has trended upward from 6.9 per cent in 2020 to 8.9 per cent in 2020. Growth management policy resulted in a steady increase of higher density housing completions and sales, generally improving affordability.

The following table shows the new housing completions, new housing under construction, and new housing starts in the City of Burlington based on unit type:

Table 3 – Summary of New Housing in the City of Burlington			
Unit Types	**New Housing Completions**	**New Housing Under Construction**	**New Housing Starts**
Apartment	503	907	404
Townhouse	104	96	70
Semi-detached	50	12	0
Single	90	73	73

The State of Housing Report shows that in 2020, 62.7 per cent of housing completions in Burlington were higher density units (townhouse and apartments). Canada Housing Mortgage Corporation ("CMHC") data shows that dwellings built from 2011 to 2016 make up only 5.2% of the total occupied private dwellings in the City of Burlington. The City of Burlington continues to shift from a majority suburban community to community with a mixture of stable suburban communities with urban centres and corridors. Therefore, the City of Burlington needs additional housing supply in order to meet the demand of a growing population. However, the data shows that new housing occupation has slowed significantly since 2011. The Subject Lands are located within the Downtown Burlington UGC/Burlington GO MTSA and will continue to support the shift in built form within the City of Burlington as the highest priority for strategic growth in Halton Region.

Halton Region's Housing Affordability Target calls for at least 30 per cent of new housing units produced annually to be at or below the affordable threshold, as noted above. In 2020, 30.5 per cent of new housing unit sales were under the Affordable Maximum Purchase Price of $480,700 in 2021. However, the Affordable Purchase Price has increased significantly from 2020, even making affordable purchases out of reach. . In addition, CMHC data shows that in the City of Burlington, median household income before taxes is $93,733, despite the region-wide income threshold set at $121,400 for affordable housing. Therefore, a majority of current City of Burlington residents do not reach the minimum income threshold for affordable housing. To

make housing more affordable for new and current residents, the City of Burlington should increase housing supply, especially in areas that can support an increased population, like the Downtown Burlington UGC/Burlington GO MTSA. As discussed above, the Owner has also offered additional units to be purchased by Halton Region at a discounted rate for the expressed provision of affordable housing. Halton Region would have control of the units and can set the purchase price/rents at an affordable level. This option has some precedence in the City of Burlington, such as the Paradigm Condo Development on Fairview Street. Exact details on the purchase structure and facilitation of these units as affordable will be determined in later stages of the approval process.

The proposed development will market for condominium units. Higher density units, such as condominium units were associated with an increased supply of affordable housing and were a significant portion of new housing completions in the City of Burlington. This clearly shows the link between higher density and affordability in the Region, especially along sites with access to local and regional transit services, such as the Downtown Burlington UGC/Burlington GO MTSA. In 2020, new sales in Burlington accounted for 15.3 per cent of total new sales in Halton Region. The proposed residential units will increase the supply of units and ensure that available units keep up with market demand and are provided at a more attainable price in appropriate location to support residential intensification.

Vacancy rates are an important measure to assess the health of the rental market. According to CMHC, a vacancy rate of at least three per cent is considered necessary for adequate competition and housing options. Halton Region's overall vacancy rate for private townhouse and apartments was 1.4per cent in 2021. In the City of Burlington, the vacancy rate was even lower at 1.2 per cent. CMHC Data taken in October 2021 shows that the vacancy rate for the City of Burlington has decreased to 1.0 per cent. The low vacancy rate suggest people continue to experience challenges finding a suitable unit when searching for rental housing. The proposed development will replace the existing 14 rental units on site so as not to further impact the vacancy rate. Those 14 units will be replaced with new units in one of the first two phases that the Region can purchase at a discounted rate and offer as rental units. The Owner has also offered to allow Halton Region to purchase additional units in any phase of the project at a discounted rate for the provision of additional affordable units.

5.0 Burlington Housing Context

This section of the Statement describes the applicable housing policies within the City of Burlington in-force OP and the City of Burlington New OP. Significant portions of the City of Burlington New OP were appealed and remain under appeal, including policies that would apply to the Subject Lands.

5.1 City of Burlington in-force Official Plan (1997)

The Official Plan for the Burlington Planning Area (1997) was adopted by the Council of the Corporation of the City of Burlington on July 11, 1994. It was subsequently approved, with modifications, by the Region of Halton, on March 5, 1997. Certain parts of the Plan were referred by the Region to the Ontario Municipal Board for a decision, and certain parts were deferred for further consideration. The City's OP was approved by the Ontario Municipal Board on October 24, 2008. The OP has undergone a number of amendments with the most recent consolidation being December 2019. Section 2.0 notes that the planning horizon of the OP is to 2021.

Section 2.3 contains policies related to housing supply.

"2.3.1 Objectives

a) To ensure that a sufficient supply of suitably designated and serviced residential land is maintained to meet existing and future housing needs.
b) To encourage the retention of existing rental housing and the construction of new rental housing.

2.3.2 Policies

f) The demolition or conversion to freehold or condominium ownership of residential rental properties containing six or more units should not be permitted unless the following conditions are satisfied:
(i) The rental vacancy rate by dwelling/structure type for the City of Burlington as defined and reported yearly through the C.M.H.C. Rental Market Survey has been at or above 3 per cent for the preceding two-year reporting period;
(ii) The building for which conversion is proposed meets the requirements of the property standards by-law, the Ontario Building Code, and any other applicable law, or will be upgraded in accordance with these standards and requirements;
(iii) Where demolition occurs, replacement rental housing units are provided for those units that are demolished;
(iv) That negative economic and other impacts upon tenants are minimized; and
(v) The requirements of any applicable Provincial legislation or regulation, as amended, are met."

The proposed development will provide for 14 new residential units in buildings in one of the first two phases that will effectively replace the existing 14 residential rental units on site. These 14 units can be purchased by Halton Region at a discounted rate and offered as rental units at a similar rental rate. As the existing rental units are located on Parcel C, and the proposed development is following a phasing program, the new units will be constructed prior to the demolition of the existing rental units on Parcel C. Therefore, no existing housing will be lost and no residents will be displaced without replacement during the redevelopment of the Subject Lands.

5.2 City of Burlington New Official Plan (2020)

A new Official Plan was adopted by City Council and approved with modifications by the Region on November 30, 2020. Significant portions of the Official Plan were appealed and remain under appeal, including the policies that would apply to the Subject Lands. While these policies remain under appeal, they are assessed for the purposes of being informative of Council's direction but are not determinative.

Section 3.1 of the City of Burlington New Official Plan (2020) provides the Housing policies for the City of Burlington. Specifically, the Official Plan states that the City of Burlington will promote an appropriate and adequate range of housing choices by type, tenure and affordability level in order to accommodate the needs of city residents. The following is the applicable policies that describe how the City of Burlington's housing objectives will be achieved.

"3.1.1(2) Policies

a) *To the extent to which land is available in the Urban Area, the City shall maintain the ability to accommodate its share of residential growth within the regional market area. The City will assist the Region of Halton in the establishment and monitoring of annual minimum targets for the production of housing units by density type, and for the production of assisted and affordable housing, based on targets established in the Regional Official Plan.*
d) *In consultation with the Region of Halton, the City will ensure an adequate level of local municipal infrastructure to meet the demands of residential development.*
e) *The City will support housing initiatives that facilitate revitalization, particularly the identification and remediation of brownfield, greyfield and bluefield lands, compact built form, flexibility and adaptability in the design and function of the housing stock, and an increased variety of housing alternatives."*

The proposed development will assist the City of Burlington in meeting its minimum housing unit targets by density type. It will also diversify the existing housing stock by providing a range of unit sizes, which will support all residents, including young households. In addition, there is adequate servicing capacity to service the Subject Lands. There is also an opportunity for affordable units to be offered. The Owner has proposed that units can be purchased by Halton Region at a discounted rate, with the units managed and maintained by the Region. The Region can then set the purchase price/rent of these units at an affordable level.

g) *"The City will develop a city-wide housing strategy that will support the Region of Halton's Housing Strategy and will:*
    (i) *Describe the current range and mix of housing in the city;*
    (ii) *Establish city-wide housing objectives, including, among other objectives special reference to a seniors housing strategy and long term care facilities;*
    (iii) *Consider the housing policies and strategies from this Plan and area-specific plans;"*

The City of Burlington is currently preparing its City-wide Housing Strategy. While the Strategy has yet to be presented to City Council the Housing Strategy includes 13 actions that contribute towards the overall Vision for housing in Burlington. As part of these action, Action #7 states that the City of Burlington will support, permit and encourage the development of alternate forms of housing, including higher density types of housing, where feasible and appropriate. The proposed development is at a proposed density and height that the surrounding area can support and will support the fulfillment of a complete community in this area.

"3.1.2 HOUSING TENURE

3.1.2(1) OBJECTIVE

a) *To maintain balance between rental and ownership housing stock in the city by protecting the existing supply of rental housing and encouraging the provision of new rental housing.*

3.1.2(2) Policies

a) *The demolition of residential rental properties or the conversion to freehold or condominium ownership of a residential rental property containing six (6) or more units, in part, or in whole, shall not be permitted unless the following conditions are satisfied:*

(i) *The rental vacancy rate by structure type for the City of Burlington as defined and reported yearly through the C.M.H.C Rental Market Report has been at or above three (3) percent for the preceding two-year reporting period;*

(ii) *The building for which conversion is proposed meets the requirements of the property standards by-law, the Ontario Building Code, and any other applicable law, or will be upgraded in accordance with these standards and requirements;*

(iii) *That negative economic and other impacts upon tenants are minimized to an acceptable level; and*

(iv) *The requirements of any applicable Provincial legislation or regulation, as amended, are met.*

b) *Notwithstanding 3.1.2 (2) a) (i), the demolition of residential rental units may be permitted in conjunction with a development application which at a minimum shall provide the same number of rental units with the same number of bedrooms per unit, at a similar rental rate at the time of development application submission, as those units that are demolished.*

c) *A development application related to the demolition of residential rental properties or the conversion to condominium tenure or owner occupancy shall include, to the satisfaction of the City, proof of tenant notification of the demolition or conversion proposal and proof of notification of the rights of tenants under Provincial residential tenancy legislation, including a minimum of 1 (one) tenants' only meeting as a part of the development application process. The preparation of a tenant relocation and assistance plan, including right to return and alternative accommodations to lessen hardship, may also be required.*

d) *The City will encourage the construction of rental housing with a full mix and range of unit types and sizes."*

As the rental vacancy rate for apartments in the City of Burlington is below three percent, the proposed development will provide for 14 units in buildings in one of the first two phases that will replace the existing 14 residential rental units on site. Halton Region can purchase these units at a discounted rate and the Region can guarantee the long-term protection of the units as rental units at the same rental rate. As the existing rental units are located on Parcel C, and the proposed development is following a phasing program, the units will be constructed prior to the demolition of the existing rental units on Parcel C. Therefore, no existing housing will be lost without replacement and no residents will be displaced during the redevelopment of the Subject Lands. The 14 units will be constructed to a similar unit type and size as the existing rental units on site.

6.0 Halton Region Housing Targets

6.1 Unit Mix Targets

As noted above, Policy 86(6)a) of the Halton Region Official Plan states that in Halton Region, at least 50 percent of new housing units produced annually will be in the form of townhouses or multi-storey buildings. The 2021 State of Housing Report shows that the target was exceeded with 62.7% of new completed units within the Region existing as townhouse or multi-storey buildings. The State of Housing Report shows that in 2020, 81.3 per cent of housing completions in Burlington were higher density units (townhouse and apartments). This demonstrates a continued trend and focus on the construction of higher density units. The proposed development will provide for 847 residential units, which will assist the Region in achieving this target, as all units will be apartment units.

Based on data provided by the State of Housing Report, the number of new housing completions in the City of Burlington has remained stagnant year-over-year since 2016 despite the population of Burlington continuing to grow. The 847 proposed residential units will increase housing supply indirectly support housing accessibility City-wide. It is important to note that the current apartment stock is still a minor component of overall housing stock compared to the existing low density housing in the City of Burlington. Therefore, it should be expected that a high percentage of new apartment units will be needed to achieve planning policy goals and objectives.

The 2020 State of Housing Report shows that in Halton Region, vacancy rates by unit types differ. For 1-bedroom units, the vacancy rate is 1.6%. For 2-bedroom units, the vacancy rate is 1.4%. For 3+ bedroom units, the vacancy rate is 1.2%. This proposed development will provide a total of 510 1-bedroom units, 303 2-bedroom units, and 68 3-bedroom units. Therefore, the proposed units will make a significant contribution to the City of Burlington's existing housing stock and potentially increase vacancy rates to above the 3 per cent threshold as discussed above.

6.2 Intensification Targets

Table 2 of the Halton Region Official Plan shows that the City of Burlington must add a minimum of 8,300 new housing units in the City of Burlington's built-up area between 2015 and 2031. This represents nearly 26% of the minimum new housing units required in the Region of Halton over this same period.

The proposal for the Subject Lands will support the City and Region's ability to meet their minimum intensification targets through to 2031. Further, as part of ROPA 49, the Region of Halton has submitted a preferred growth concept that would result in no urban boundary expansion. Through ROPA 49, the Region of Halton is proposing the following intensification target for population and employment growth between 2022 and 2041:

Target[1]	*Halton Region*	*Burlington*
Intensification Target		
Housing Units in Built-Up Area	*53,300*	*20,500*

1. Target for the number of new housing units occurring with the Built-Up Area as shown on Map 1H between 2022 and 2041 and representing 45% of all new units during this period."

6.3 Affordable Housing Targets

The proposed development will market for condominium units, excluding the 14 rental units that are offered to replace the existing rental units on site.

For units offered for purchase/sale, in 2020, 25.9% of new housing unit sales were affordable. The average sale price of new units sold at or below the affordable threshold was $337,481. As discussed in Section 4.2, it is expected that the units will be offered at market rate. The Owner has offered to allow Halton Region to purchase additional units in any phase of the project at a discounted rate. Therefore, the Region would have control of the units and set the purchase price/rents at an appropriate level, including at an affordable or assisted housing rate.

In terms of rental units, the 2021 State of Housing Report shows that from 2019 to 2020, the total number of rental units continues to remain stagnant with a slight decrease from 16,830 units in 2020. The average

rent of private townhouses and apartments for all unit sizes have steadily increased over the past five years. In 2020, the average rent for all unit types in Halton Region increased to $1,600 from $1,583 in 2019, a 1.1 per cent increase. By unit size, the average rent for bachelor units had the highest increase at 8.4 per cent from 2020. The average rent for 1 Bedroom unit actually decreased by 0.1%. . Based on the rental rates for the existing two-bedroom units on the Subject Lands ($771.00 to $991.00), all 14 units will continued to be offered at an affordable rate.

The composition and diversity of units being offered in this proposed development will increase the availability of housing in the Region, helping the Region reach current demand and offering units at an attainable cost of housing City-wide.

As described above, the Owner has offered that Halton Region could purchase units within any phase of the proposed development at a discounted rate and in turn, offer those units at an affordable and/or assisted level for residents along all stages of the housing continuum. As Burlington's vacancy rate continues to trend upwards, the supply of affordable housing continues to diminish. This potential agreement between the Owners and the Region of Halton would supply additional affordable housing, making the Region more accessible for new residents and guaranteeing the long-term protection of affordable units. In addition, there is precedence for a similar type of agreement in this area with the Paradigm Condominium development on Fairview Street.

6.3.1 Current Opportunities to Provide Affordable Housing

Halton Region utilizes various programs to support affordable housing opportunity and delivery. This includes programs that convert market-rate units to assisted housing units. For example, Halton Region's Assisted Housing Program reduces the cost of housing for individuals and families who cannot afford their rent. The program relies on landlords contributing units to the program. Following that, Halton Region, based on individual or household eligibility, places applicants in these units. A housing subsidy is then paid directly to the landlord. The 2021 Halton State of Housing Report shows that there were 887 households using these rent supports. As described above, the potential agreement between the Owners and the Region of Halton to sell units in any of the three phases at a discounted rate could contribute to this program.

Halton Region also offers the Halton In-Situ Program ("HIP") that offers an ongoing housing allowance to residents who qualify for assisted housing. This program provides residents with a monthly rental allowance with the goal of keeping people in the communities where they live.

Social housing development is also supported through Halton Region's Development Charges. Based on the current Social Housing Development Charge rate, the 847 units proposed will contribute significant funds for the provision of social housing.

6.3.2 Future Opportunities to Provide Affordable Housing

The City of Burlington continues to explore new opportunities to increase the supply of affordable units. This includes inclusionary zoning and community benefits charges.

On April 14, 2022, the City of Burlington released their draft Housing Strategy. Action Item No. 12 is to undertake a formal assessment of the potential to introduce inclusionary zoning. The time-frame for this action item is short-term. Inclusionary Zoning is a provincial planning tool that enables municipalities to

secure affordable housing units in new developments of 10 units or more. Current Provincial legislation allows for the implementation of Inclusionary Zoning in Protected Major Transit Station Areas ("PMTSAs") only which include the Burlington GO MTSA. In accordance with Ontario Regulation 232/18, the City of Burlington is required to prepare a peer-reviewed Municipal Assessment Report that contains recommendations related to the feasibility of Inclusionary Zoning in each of the PMTSAs.

Community Benefits Charges or "CBCs" are paid to lower and single-tier municipalities for high-density developments with 5 or more storeys and 10 or more units. Municipalities will need to adopt CBC by-laws as of September 2022. CBCs are capped at 4% of land value and are based on the value of land the day before building permits are issued. Funds collected through CBCs can be used to fund a variety of programs, including affordable and assisted housing initiatives.

7.0 Conclusions

As outlined in this Housing Impact Statement, together with the supporting technical reports including the Planning Justification Report, the proposed development and associated Official Plan and Zoning By-law Amendments represent an appropriate intensification of the Subject Lands and the supply of much needed new housing units.

The proposal introduces a mixed-use development on the site, providing 847 residential units within a Strategic Growth Area. The proposed development will make efficient use of underutilized lands by proposing residential intensification on site that is well-connected to public transit and makes efficient use of existing municipal servicing and infrastructure.

The table below summarizes how the Subject Lands address each of the TOR components for this Statement:

Policy	Analysis
1) Demonstration of how the proposed conversion of existing rental units complies with Policy Part III, Section 2.3.2 f) of the City Official Plan (1997, as amended); *f) The demolition or conversion to freehold or condominium ownership of residential rental properties containing six or more units should not be permitted unless the following conditions are satisfied:* *(i) the rental vacancy rate by dwelling/structure type for the City of Burlington as defined and reported yearly through the C.M.H.C. Rental Market Survey has been at or above 3 per cent for the preceding two-year reporting period;* *(ii) the building for which conversion is proposed meets the requirements of the property standards by-law, the Ontario Building Code, and any other applicable law, or will be upgraded in accordance with these standards and requirements;*	The proposed development will provide for 14 residential units in buildings in one of the first two phases that Halton Region can purchase at a discounted rate to replace the existing 14 residential rental units currently on site. The Region can then guarantee that these 14 units are rented at their existing rate. As the existing rental units are located on Parcel C, and the proposed development is following a phasing program, the new rental units will be constructed prior to the demolition of the existing rental units on Parcel C. Therefore, no residents will be displaced and no rental housing will be lost during the redevelopment of the Subject Lands.

(iii) where demolition occurs, replacement rental housing units are provided for those units that are demolished; *(iv) that negative economic and other impacts upon tenants are minimized; and* *(v) the requirements of any applicable Provincial legislation or regulation, as amended, are met.*	
2) Demonstration of how the proposed conversion of existing rental units complies with Section 3.1.2 (Housing Tenure) of the City's New Official Plan (2020) *"3.1.2(2) POLICIES* *a) The demolition of residential rental properties or the conversion to freehold or condominium ownership of a residential rental property containing six (6) or more units, in part, or in whole, shall not be permitted unless the following conditions are satisfied:* *(i) The rental vacancy rate by structure type for the City of Burlington as defined and reported yearly through the C.M.H.C Rental Market Report has been at or above three (3) percent for the preceding two-year reporting period;* *(ii) The building for which conversion is proposed meets the requirements of the property standards by-law, the Ontario Building Code, and any other applicable law, or will be upgraded in accordance with these standards and requirements;* *(iii) That negative economic and other impacts upon tenants are minimized to an acceptable level; and* *(iv) The requirements of any applicable Provincial legislation or regulation, as amended, are met.* *b) Notwithstanding 3.1.2 (2) a) (i), the demolition of residential rental units may be permitted in conjunction with a development application which at a minimum shall provide the same number of rental units with the same number of bedrooms per unit, at a similar rental rate at the time of development application submission, as those units that are demolished.* *c) A development application related to the demolition of residential rental properties or the conversion to condominium tenure or owner occupancy shall include, to the satisfaction of the City, proof of tenant notification of the demolition or conversion proposal and proof of notification of the rights of tenants under Provincial residential tenancy legislation, including a minimum of 1 (one) tenants' only meeting as a part of the*	As the rental vacancy rate for apartments in the City of Burlington is below three percent, the proposed development will provide for 14 residential units in buildings in one of the first two phases. Halton Region can purchase these units at a discounted rate to replace the existing 14 residential rental units on site. As the existing rental units are located on Parcel C, and the proposed development is following a phasing program, the new rental units will be constructed prior to the demolition of the existing rental units on Parcel C. Therefore, no residents will be displaced during the redevelopment of the Subject Lands. The 14 new rental units will be constructed as a similar unit type and size as the existing rental units on site. The Region will guarantee the long-term protection of the units as rental units and can guarantee that these 14 units will be rented at their current rate.

development application process. The preparation of a tenant relocation and assistance plan, including right to return and alternative accommodations to lessen hardship, may also be required. *d) The City will encourage the construction of rental housing with a full mix and range of unit types and sizes."*	
3) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the City's New Official Plan (2020);	
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development will provide for a total of 847 apartment units and will help assist Halton Region in achieving its housing targets, including Policy 86(6) a) and Policy 86(6) b) of the Halton Region Official Plan. The proposed unit mix will appeal to a range of residents in the City of Burlington, including young households. This increased supply of housing supports overall housing affordability by ensuring that there is sufficient supply to accommodate anticipated demand. In addition, the Owner has offered to allow the Region to purchase additional units in any phase of the project at a discounted rate allowing the Region to control these units and set purchase price/rents at an appropriate affordable level. Currently, the Owners have determined that a total of XX units could be offered at a purchase price that is below the maximum affordable threshold.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential sale price for units in the proposed development has not been determined. It is expected that the proposed units will be offered at an acceptable market rate. To replace the existing 14 residential rental units on site, 14 new units will offered for the Region to purchase at a discounted rate in buildings in one of the first two phases. The Region can then manage the rental of these 14 units. At their current rates, these 14 units would be considered affordable. In addition, the Region has the option to purchase additional units in any phase of the project at a discounted rate that they can then provide as affordable housing.
(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	The development will occur over three phases. Parcel A, in the northwest corner of Brant Street and Ghent Avenue will be developed first, followed by Parcel B in the

	northeast corner, and Parcel C in the southeast corner. The 14 new rental units that are replacing the existing rental units will be provided in one of the first two phases. As the existing rental units are located on Parcel C, and the proposed development is following a phasing program, the new units will be constructed prior to the demolition of the existing rental units on Parcel C. Therefore, no residents will be displaced and no rental housing will be lost during the redevelopment of the Subject Lands. In addition, the Region has the option to purchase additional units in any phase of the project at a discounted rate that they can then provide as affordable housing.
(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.	It is expected that the proposed residential units will be offered at an acceptable market rate. Halton Region will have an opportunity to purchase units in any phase of the project at a discounted rate in order to provide affordable housing, similar to Halton Region's Assisted Housing Program. In addition, the provision and inclusion of affordable housing City-wide can be supported by potential future policies including Inclusionary Zoning and Community Benefits Charges.
4) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.	The Subject Lands consists of thirteen (13) properties on the northwest, northeast, and southeast corners of the Brant Street and Ghent Avenue intersection in the City of Burlington. For the purposes of this application, the properties have been assembled into three parcels. The three parcels have a total site area of 1.71 ha consisting of various frontages along Brant Street and Ghent Avenue. Over the three parcels, the proposed development will provide for a mix of 1, 2, and 3-bedroom units. In total, 475 1-bedroom units, 365 2-bedroom units, 5 3-bedroom units, and 2 studio units will be provided for a total of 847 residential units. 15% of each unit type will be built as barrier-free. A range of unit sizes will accommodate a range of households and address a range of

	housing needs. The units will be offered at an acceptable market rate. The Region of Halton can purchase units within any phase of the project at a discounted rate for the provision of affordable housing.
5) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report; and	The proposed development will increase the overall supply of new housing units in the City of Burlington and in Halton Region within an area designated for growth and intensification as part of the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor. The proposed development contributes to the shift in single detached residential built form in Burlington by proposing residential apartment units in a range of types and sizes while also offering additional units for the provision of affordable housing.
6) Identify and discuss other relevant and current housing information available.	The City of Burlington is currently preparing its City-wide Housing Strategy. Action #7 states that the City of Burlington will support, permit and encourage the development of alternate forms of housing, including higher density types of housing, where feasible and appropriate. The proposed development is at a density and height that the surrounding area can support and will support the fulfillment of a complete community with needed new housing supply in the Downtown Burlington UGC/Burlington GO MTSA on a Priority Transit Corridor.

Respectfully submitted,
MHBC



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